

Analysis Plan
Oil Re-Refining Co., Inc.

Used Oil Acceptance Procedures

Before the facility accepts any used oil for storage and/or treatment, a completed Waste Material Profile Sheet must be provided by the generator or the generator's agent. When the profile information is determined to be complete, it will be reviewed in order to assess the acceptability of the used oil for recycling at the facility. These profile approval procedures occur prior to accepting any used oil for storage or processing. The facility shall not accept any materials without a completed profile, verifying by signature that the material has not been mixed with a hazardous waste.

If the profile is approved, then the oil may be accepted into the facility. Upon arrival, the oil is inspected, sampled, and tested for acceptance criteria (a halogens test is performed using a Clor-D-Tect 4000 Test Kit, or a Hydro-Clor Test Kit) prior to it being accepted or commingled with other waste streams.

Facility Inspections

Operators at the facility shall inspect and maintain the facility to prevent deterioration or the release of used oils to the environment that would pose a threat to human health. Inspections of the used oil operations will take place on a weekly basis to ensure:

- Best Management Practices are followed,
- No runoff or leachate leaves the containment area in order to prevent stormwater contamination,
- Attempts are made to ensure the used oil operations are kept clean and within compliance of state and federal regulations,
- Compliance with SPCC Regulations and all permits held by the facility are ensured.

An inspection log will be kept at the facility for review, per SPCC regulations.

Analysis Information

Once per week, prior to the shipment of any RFO (Refined Used Oil Fuel), the tank is locked down to ensure no additional oils are added. The composite samples are blended into one representative sample, labeled "weekly plant production," and shipped offsite to a Certified Laboratory. The following tests are performed to ensure compliance:

<u>Testing Constituent</u>	<u>Test Method Used</u>	<u>Allowable Level</u>
Total Arsenic	6010B	5ppm
Total Cadmium	6010B	2ppm
Total Chromium	6010B	10ppm
Total Lead	6010B	100ppm
Flash Point	1010	100°F minimum
Total Halogens	9075	1,000ppm
PCB's	8082	<2ppm

No shipments from the storage tanks will take place until the analytical results have come back from the laboratory, and all parameters are shown to be within compliance of State and Federal rules (or if any parameters are shown to be out of compliance, rebuttable presumption must be provided).

Rebuttable Presumption

If Total Halogens exceed 1,000ppm, then the laboratory will be contacted and asked to perform additional testing to try to provide rebuttable presumption (Test Method 8260, a Chlorinated VOC Scan, will be used for this purpose). If the presumption cannot be rebutted, then the material will not be shipped off site, and will be handled according to Federal Regulations.

Shipping Procedures and Record Keeping

Once the RFO (Refined Used Oil Fuel) has been determined to be On Specification, it is ready for shipment. The tank is unlocked and connected to the truck hauling the RFO (Refined Used Oil Fuel) to its destination. All lines will be secured and checked for integrity and proper connection prior to pumping from the tank to the truck. The plant operator loading the truck will stay with the truck throughout the process to ensure no overflow takes place, and will also take a representative composite sample of the material being loaded onto the truck. The facility keeps these retain samples for a period of 6 months. Once the transfer is complete and the truck is loaded, the lines will be disconnected and secured.

A shipping ticket and the laboratory analytical results shall accompany the load to its destination. The shipping ticket will contain the following information:

- Shipping Ticket Number (this number is also attached to the retain sample)
- Transporter Information, including the Driver's Name & company name, address, telephone number, and EPA Identification number, if any.
- Shipping Facility Information, including Company name, address, telephone number, EPA Identification Number, and Tank Number material originated from (#6).
- Receiving Facility Information, including Company name, address, telephone number, EPA Identification Number.
- Quantity of On Specification Used Oil Fuel shipped.
- Shipment Date.
- Laboratory Identification Number (which identifies the sample specifically by number), to ensure a specific analytical is referenced for each shipment.

Both the shipping and receiving facilities will retain a copy of these records (the shipping ticket and the laboratory analytical results, which will include the sample's collection date) at their site for a minimum of 3 years. Records will be available upon request.

Training

All employees involved in the shipment of this product will be trained in details of this Analysis Plan at their time of hire, and refreshers shall take place at least annually. Records will be available upon request.